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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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July 8, 1997

Via Hand Delivery

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: MM Docket Nos: 91-221, 87-8, 94-150, 92-51 and 87-154

Dear Mr. Caton:

Three Feathers Communications, Inc. ("Three Feathers"), the permittee of KWAJ(TV), a new television station at Hutchinson, Kansas, by its attorneys, hereby submits the following information in response to the Commission's public notice "*Commission Seeks Further Information Regarding Television LMAs*," DA 97-1246 (released June 17, 1997).

Three Feathers is currently a party to a local marketing agreement ("LMA") with Clear Channel Television, Inc. ("Clear Channel"), the licensee of KSAS-TV, Wichita, Kansas. Pursuant to the LMA, Clear Channel will supply the majority of the programming for Three Feathers' new station. Attached hereto is a summary of the terms of the LMA agreement between Three Feathers and Clear Channel.

With regard to the public interest benefits of the Three Feathers/Clear Channel LMA, Three Feathers submits that the LMA will provide benefits that will be enjoyed by the residents of the Wichita-Hutchinson market and that will advance the Commission goal of diversity of voices and programming.

For example, the Three Feathers/Clear Channel LMA will result in greater diversification of the programming currently offered in the Wichita-Hutchinson market. With programming obtained by Clear Channel, Three Feathers will offer a variety of entertainment, news and informational programming previously unavailable. Three Feathers does not have the financial

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Mr. William F. Caton

July 8, 1997

Page 2

resources to independently secure and provide the quality programming it will offer under the LMA with Clear Channel.

In addition, with the LMA Three Feathers will be better able to construct the necessary facilities and equip the new station with state-of-the-art technology authorized in the Commission's DTV proceeding. These improvements will facilitate the provision of additional and varied programming to the Wichita-Hutchinson Market.

Moreover, without the relationship between Three Feathers and Clear Channel, Three Feathers' application would still be frozen with three other mutually-exclusive applications that were filed for the new station on channel 36 at Hutchinson. As a result of its relationship with Clear Channel, Three Feathers was able to facilitate a settlement agreement between with the three other mutually-exclusive applications and make settlement payments to the other applicants. With Clear Channel's support, Three Feathers negotiated settlement agreements and is preparing to deliver to the Wichita-Hutchinson market an additional, competitive source of programming on broadcast spectrum that otherwise was unutilized.

The Three Feathers/Clear Channel LMA will improve the variety and quality of programming in the Wichita-Hutchinson market and has resulted in the resolution of four mutually-exclusive applications and the issuance of a construction permit for a new television station that will serve the Wichita-Hutchinson market. Accordingly, the Wichita-Hutchinson market has benefited and will continue to benefit from the LMA between Three Feathers and Clear Channel. Therefore, Three Feathers urges the Commission to grandfather the Three Feathers/Clear Channel LMA for its full and complete term, including renewal options.

Please contact the undersigned with any further questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Naomi S. Travers". The signature is written in a cursive, flowing style.

Naomi S. Travers

Enclosure

92557

LMA REPLY FORM

MARKET: Wichita-Hutchinson

DMA #: 65

	<u>Channel No. & Call Sign</u>	<u>Network Affiliation</u>	<u>Licensed Community</u>	<u>Owner/ Licensee</u>	<u>Degree of Overlap(%)</u>			<u>Nielsen (all day) Audience Share (9 am - midnight)</u>		
					<u>City Grade</u>	<u>Grade A</u>	<u>Grade B</u>	<u>11/96</u>	<u>2/97</u>	<u>5/97</u>
Brokered Station:	Channel 36 KWAJ (construction permit)	--	Hutchinson, Kansas	Three Feathers Communications, Inc.	97.8%	97.8%	97.8%	N/A	N/A	N/A
Brokering Station:	Channel 24 KSAS-TV	Fox	Wichita, Kansas	Clear Channel TV, Inc.	97.8%	97.8%	97.8%	8	7	5

	<u>Date of LMA Signing</u>	<u>Length of Initial Term</u>	<u>Initial Term Start Date</u>	<u>Initial Term End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	<u>% Time Brokered per week</u>
LMA Specifics:	2/1/96	5 years	2/1/96	5 years from the date FCC grant of Three Feathers construction permit becomes final	(1) Five one-year renewal terms provided; (2) Renewal option is exercisable by Broker; (3) Renewal option is not automatic; (4) Renewal option must be exercised by Broker six months prior to expiration of the initial term and three months prior to expiration of any renewal term.	N/A*

*Not applicable because KWAJ is not yet constructed or operational. Under the Three Feathers/Clear Channel LMA, Three Feathers has the right to program KWAJ for up to 24 hours a week with public affairs programming.